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cc: lucierg@msn.com, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc:
Subject: Environmental Defense comments on Ethanol, 2-(Hydroxymethylamino)- (CAS# 34375-28-5)

(Submitted via Internet 7/28/05 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and Akiley@regnet.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Ethanol, 2-(Hydroxymethylamino)- (CAS# 34375-28-5)**.

The robust summaries for ethanol, 2-(hydroxymethylamino)- (Troysan 174) were submitted by Troy Corporation. According to the sponsor, production and use of this compound is limited to pesticidal applications as a bactericide in a wide range of products which are subject to bacterial deterioration, such as metalworking fluids, latex paints, resin emulsions, adhesives, pigment dispersions, joint cements, cutting oils and drilling additives. Thus, there are considerable opportunities for environmental and human exposures. Troysan 174 is apparently rapidly degraded in aqueous environments to formaldehyde and ethanolamine. Both of these degradation products have been the subject of considerable toxicological studies. Formaldehyde is classified as a known human carcinogen by the International Agency for Cancer research.

The sponsor states that Troysan 174 is regulated under FIFRA (registration #5383-11), not under TSCA, and that it therefore should not be listed as an HPV chemical. (We defer to EPA on this question, and also note that the non-confidential 2002 IUR data list a different company, Borden Chemical, as having reported producing this chemical. See www.epa.gov/oppt/iur/iur02/search.htm.) Nevertheless, the sponsor has provided robust summaries for the purpose of providing the American public access to basic information concerning this chemical. Assuming the chemical or Troy's production of it is indeed exempt from TSCA, we compliment Troy Chemical for recognizing the importance of "right to know" initiatives and for submitting objective and informative robust summaries.

The sponsor does not propose any additional testing, although no data are provided for many of the SIDS endpoints. Endpoints for which data are apparently lacking include fugacity analysis, biodegradation, photodegradation, algal toxicity and reproductive toxicity. Inasmuch as Troysan 174 is positive in the Ames test and moderately toxic to aquatic invertebrates, we recommend that the sponsor consider conducting some additional tests and/or providing some information on the major degradation products, formaldehyde and ethanolamine. In particular, information on reproductive toxicity and plant toxicity is needed. We also note that the repeat dose studies used the dermal route of exposure, although no information was provided on the systemic uptake from such exposures to indicate that this route would be the major one for exposure. Therefore, the sponsor should consider conducting a combined repeat dose/reproductive study using the oral route of exposure.

Thank you for this opportunity to comment.

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